

Name: UK CAA			
Document: CRD b.3 - Part-CAT			
Reference		Proposal / Comment	Justification
Page No.	Paragraph No.		
All	All	A number of comments were submitted to NPA 2009-02 that contained proposals from a long standing JAA NPA which has been awaiting publication. This contained a number of improvements to the text of JAR-OPS 1 Subparts F, G, H and I. Most of these comments have not been included in the resulting text, some 'pending future rulemaking task'. Some of the more urgent comments are repeated below, but it is generally recommended that a rulemaking group is established to undertake a review of the important work completed by the JAA in this area as a matter of priority with a view to progressing the proposals into the implementing rules.	
33	CAT.GEN.AH.105 (a) (10)(i)	<p>This section does not include the statement that data from Flight Recorders must not be intentionally erased in flight (regardless of whether or not there has been an incident or accident).</p> <p>Propose to revert to text from OPS1.085(f)(10)(i):</p> <p>(10) ensure that means installed on board for recording data of flight recorders:</p> <p>(i) are not disabled, or switched off or erased during flight; and</p>	Alignment with EU-OPS / JAR-OPS 3 text

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33	CAT.GEN.AH.105 (a) (10)(ii)	<p>The leading sentence should include the phrase 'subject to mandatory reporting'</p> <p>Additionally at (C), the requirement for reactivation of a flight recorder is unlikely to be the responsibility of the Commander therefore this sentence should be deleted.</p> <p>Propose:</p> <p>(ii) in the event of an accident or an incident <i>subject to mandatory reporting</i>.</p> <p>(A) are not intentionally erased;</p> <p>(B) are deactivated immediately after the flight is completed;</p> <p>(C) are reactivated only with the agreement of the investigating authority;</p>	Consistency with CAT.GEN.AH.195
34	CAT.GEN.AH.105 (a) (12)	<p>Incorrect requirement.</p> <p>Change text to:</p> <p>.... carried out in accordance with the operations manual.</p>	Crew pre-flight inspection is not a part of Part M requirements
34	CAT.GEN.AH.105 Responsibilities of the commander – paragraph d	<p>Repeated text.</p> <p>Replace (d)(1) with:</p> <p>(1) Whenever a potential bird hazard is observed, the commander shall immediately inform the appropriate ATS unit.</p>	Editing error.

34	CAT.GEN.AH.105 (d)(2)	<p>A bird strike should be reported regardless of damage to aircraft. Amend paragraph to read:</p> <p>(2) Whenever an aircraft for which the commander is responsible suffers a bird strike that results in significant damage to the aircraft or the loss or malfunction of any essential service, the commander shall submit a written bird strike report after landing to the competent authority.</p>	Meets current requirements
36	CAT.GEN.AH.155 (b)	<p>Text from EU-OPS giving States authority to vary conditions of carriage is missing.</p> <p>Add sentence after b (2)</p> <p>Unless, before the commencement of the flight, approval has been granted by all States concerned that such weapons of war and munitions of war may be carried in circumstances that differ in part or in total from those indicated in this subparagraph.</p>	Alignment with EU-OPS / JAR-OPS 3 text.
36	CAT.GEN.AH.160 (b)(1)	<p>Text from OPS 1.070 / JAR-OPS 3.070 allowing the competent authority to approve variations for aeroplanes/helicopters is missing, eg where there is no separate baggage compartment.</p> <p>Amend (b)(1):</p> <p>(b) The operator accepting the carriage of sporting weapons shall ensure that they are:</p>	Alignment with EU-OPS / JAR-OPS 3 text.

		(1) stowed in the aircraft in a place which is inaccessible to passengers during flight unless the authority has determined that compliance is impracticable and has accepted that other procedures might apply; and	
37	CAT.GEN.AH.180	The requirement at OPS 1.125(b) and JAR-OPS 3.125(b) that the flight crew member shall carry a valid flight crew licence has been omitted. This requirement should be added.	Alignment with EU-OPS text / JAR-OPS 3 text and as required for Ramp Checks as in AR.GEN.435.
38	CAT.GEN.AH.180(a)(22)	180.(a)(22) refers to 'special loads' but the equivalent text in EU-OPS that refers specifically to written information about dangerous goods being provided to the commander is missing. Amend paragraph to read: (22) notification of special categories of passenger and/or special loads, including dangerous goods, together with any written information to the commander, if applicable; and	Alignment with EU-OPS text / JAR-OPS 3 text
39	CAT.GEN.AH.195	Change title. Remove reference to aeroplanes in title and change "aeroplane" in paragraph (a) to 'aircraft'.	Should also apply to helicopters as they carry FDR etc.

39	CAT.GEN.AH.195	<p>The following extract from EU-OPS / JAR-OPS 3 is missing and should be added. It is important as it allows the authority to 'impound FDR' data from an aircraft not directly involved in an incident or accident but may be of use to an investigation.</p> <p>EU-OPS 1.160 (a)(3)</p> <p><i>Additionally, when the Authority so directs, the operator of an aeroplane on which a flight recorder is carried shall preserve the original recorded data for a period of 60 days unless otherwise directed by the investigating authority.</i></p>	Alignment with EU-OPS /JAR-OPS 3 text.
39	CAT.GEN.AH.195(a)	<p>The text of this paragraph has been drawn from OPS 1.160 and JAR-OPS 3.160, paragraphs (a) 1, 2, 3 but has lost their specific meaning and intent.</p> <p>The text of CAT.GEN.AH.195(a) should be replaced by the EU-OPS / JAR-OPS 3 text to preserve the requirements.</p>	Alignment with EU-OPS / JAR-OPS 3 text
39	CAT.GEN.AH.195 (c)	Replace ref CAT.IDE.A.270 with <i>CAT.IDE.A.190 or CAT.IDE.H.190</i>	Reference errors
42	CAT.OP.AH.100(a)(1)	This statement has been changed from that in OPS 1.215 / JAR-OPS 3.215 by an addition referring to 'applicable rules of the air'. This is incorrect as this section refers to Air Traffic	Alignment with EU-OPS / JAR-OPS 3

		<p>Services.</p> <p>Rules of the air are always applicable and are implicit within the Basic Regulation.</p> <p>Revert to EU-OPS / JAR-OPS 3 text and delete reference to 'rules of the air' ie:</p> <p><i>'air traffic services (ATS) appropriate to the airspace used for all flights whenever available'</i></p>	
44	CAT.OP.AH.120	<p>This section on ARAs requires a leading sentence to place the requirement on the operator as depicted in many other similar paragraphs.</p> <p>New paragraph (a):</p> <p><i>The operator shall establish procedures to ensure that overwater ARAs are carried out according to the following criteria.</i></p> <p>Renumber subsequent paragraphs accordingly.</p>	Clarification of the responsibility of helicopter operators.
47	CAT.OP.AH.140(d)	<p>CAT.OP.AH.140 is concerned with aircraft without an ETOPS approval.</p> <p>Sub-paragraph (d) has been added to the text from EU-OPS and is not relevant as it refers to approval being gained if the aircraft has an ETOPS type design and reliability approval.</p> <p>Revert to EU-OPS text and delete para (d)</p>	Correction and alignment with EU-OPS

55	CAT.OP.AH.190 (a)	<p>The paragraph does not state when an ATS flight plan should be filed as stated in OPS 1.300 and JAR-OPS 3.300 and introduces text at (a) that is not appropriate for CAT.</p> <p>Amend the paragraph to read:</p> <p>(a) An operator shall ensure that a flight is not commenced unless an ATS flight plan has been submitted, or adequate information has been deposited in order to permit alerting services to be activated if required.</p> <p>If an ATS flight plan is not submitted because it is not required by the rules of the air, adequate information shall be deposited in order to permit alerting services to be activated if required.</p>	Correcting text for CAT operations and alignment with EU OPS and JAR-OPS 3.
56	CAT.OP.AH.216	<p>Amend text to reflect proposed JAR-OPS 3 text and to correct language.</p> <p>Each flight crew member required to be on in the flight crew compartment shall wear a headset with boom microphone, or equivalent, and use it as the primary device to communicate with ATS for all voice communications.</p>	Aligns with NPA-OPS 68 (which has been adopted by EASA) and recognises the higher noise level environment of helicopters.
58	CAT.OP.AH.245 (b)	<p>Amendment is necessary to the text to align with JAR-OPS 3.340(c) without affecting equivalent text from OPS 1.340(b).</p> <p>(b) On IFR flights, the commander shall only continue towards the planned destination</p>	Alignment with JAR-OPS 3.340(c)

		aerodrome when the latest information available indicates that, at the expected time of arrival, the weather conditions at the destination, or at least one destination alternate aerodrome, if required , are at or above the applicable aerodrome operating minima.	
58	CAT.OP.AH.245 (e)	<p>The text does not reflect its origins in JAR-OPS 3 and should be amended as indicated:</p> <p>(e) <i>The operator is to ensure that low level flights overwater out of sight of land are only conducted under VFR when the cloud ceiling is greater than 600 ft by day and 1200 ft by night.</i></p> <p>On VFR flights overwater with helicopters, the commander shall only commence take-off when the appropriate weather reports and/or forecasts indicate that the cloud ceiling will be above 600 ft by day or 1 200 ft by night.</p>	Clarification of purpose and alignment with JAR-OPS 3.465
60	CAT.OP.AH.275	<p>Amend the text to read;</p> <p><i>The operator shall ensure that simulated IMC or simulated abnormal or emergency procedures, or circumstances requiring such procedures, shall not be carried out during commercial air transportation operations.</i></p>	Clarification of the intent of this paragraph.
62	CAT.OP.AH.300	Amendment to text for helicopter operations.	Clarification for helicopter operations.

		Before commencing an approach to land, the commander shall be satisfied that, according to the information available to him/her, the weather at the aerodrome and the condition of the runway / FATO intended to be used should not prevent a safe approach, landing or missed approach, having regard to the performance information contained in the operations manual.	
63	CAT.OP.AH.305	<p>Minor amendments to text in paragraphs (a) and (b) to include visibility as well as RVR and the 'reported' touchdown zone RVR in (f).</p> <p>(a) The commander or the pilot to whom conduct of the flight has been delegated may commence an instrument approach regardless of the reported RVR / VIS.</p> <p>(b) If the reported RVR / VIS is less than the applicable minimum the approach shall not be continued:</p> <p>(f) The reported touchdown zone RVR shall always be controlling. If reported and relevant, the midpoint and stopend RVR shall also be controlling. The minimum RVR</p>	Clarification and consistency.
64	CAT.POL.A.105(d)	Delete paragraph (d) which allows a damp runway to be considered dry for performance purposes.	Research conducted by the FAA and the National Aeronautics and Space Administration shows that a damp runway does not provide an equivalent braking surface as a dry runway. In the light of such evidence, it is clearly not appropriate (i.e. unsafe) to allow damp runways to be considered as dry.

<p>64 65 65 76 84 254</p>	<p>CAT.POL.A.105(b) CAT.POL.A.200(a) CAT.POL.A.200(b) CAT.POL.A.335(b) CAT.POL.A.435(b) AMC1- CAT.POL.A.105</p>	<p>Why have the words “acceptable to the Authority” currently in various paragraphs, e.g. EU-OPS 1.475(b) and 1.485(a), been deleted ?</p> <p>The equivalent paragraphs in both EU-OPS 1 and JAR-OPS 1 paragraphs all required supplemental AFM data, procedures and equivalent certification standards to be acceptable to the operator’s Authority. This aspect of approval has been removed. It should be reinstated as follows:-</p> <p>CAT.POL.A.105(b) The approved performance data contained in the aircraft flight manual (AFM) shall be used to determine compliance with the requirements of the appropriate chapter, supplemented as necessary with other data <u>acceptable to the Authority</u> as prescribed in the relevant chapter. The operator shall specify other data in the operations manual. When applying the factors prescribed in the appropriate chapter, account may be taken of any operational factors already incorporated in the AFM performance data to avoid double application of factors.</p> <p>CAT.POL.A.200(a) The approved performance data in the AFM shall be supplemented as necessary with other data <u>acceptable to the Authority</u> if the approved performance data in the AFM is insufficient in respect of items such as etc, as applicable.</p>	<p>All performance data and procedures which are used to comply with the operating requirements must be seen to meet a minimum standard, and this standard needs to be applied uniformly to all operators through the oversight by the competent Authority. This is consistent with the Basic Regulation’s goal for a high and uniform level of safety across MS.</p>
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<p>65 & 256</p>	<p>CAT.POL.A.200(b) & GM1-CAT.POL.A.205</p>	<p>This text leaves it open as to what the applicable certification standards for contaminated runways that need to be applied are. Text based on a draft JAA NPA clarifies this both in rule and guidance material should be used as follows:-</p> <p>CAT.POL.A.200(b)</p> <p>(b) For the wet and contaminated runway case, performance data determined in accordance with applicable standards on certification of large aeroplanes or equivalent shall that complies with or is equivalent to either Change 13 of JAR-25 or that appropriate to the type certification date, whichever is the later, must be used.</p> <p>GM1-CAT.POL.A.205</p> <p>Add new a new paragraph as follows:-</p> <p>The performance data that is used to show compliance with the take-off requirements of JAR-OPS 1.490 on wet and contaminated runways need only reflect the effects of drag and runway braking on the performance data determined at the time of type certification; as such, data which is in compliance with or is equivalent to Change 13 of JAR-25, or that standard appropriate to the type certification date, whichever is later, will have deemed to have been demonstrated on this basis.</p>	<p>The underlying intention of the rule is that the required standard of wet runway take-off data is that which has been determined in accordance with either JAR-25 Change 13 (which was the first satisfactory standard of wet and contaminated runway performance), or that which is appropriate to the type certification basis of the aeroplane, whichever is the later. This is not reflected by the current text, which is vague.</p> <p>It is also suggested that an additional paragraph be included in the guidance material that provides clarification of the intention that the performance data need only account for the effect of the contaminant on runway performance and that existing methodologies used in the certified performance data remain valid.</p>
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		<p>Accordingly therefore, the performance assumptions used by the type's certification standard remain valid, except as modified by the effects of contaminants. These include, for example, accelerate-stop distance definition, time delays, take-off distance definition, and braking means. For aeroplanes whose type certification date precedes Change 13 of JAR-25 the data should be of a standard which provides an equivalent level of safety to, and thus comply with the safety intent of, Change 13 of JAR-25, and be acceptable to the Authority.</p>	
65	CAT.POL.A.205	<p>Amend paragraph (b)(4) as follows:- Compliance with this paragraph must be shown using the same a single-value of V1 for the rejected and continued take-off; and</p>	<p>This proposal makes it clearer that although there may be a range of V1 speeds from which to choose for a particular take-off calculation, the requirement is that the same value must be used for both the rejected and continued takeoff analyses.</p>
76	CAT.POL.A.330	<p>Add a new paragraph (f) to read as follows:- (f) When showing compliance with paragraph (b) above, the criteria of paragraph (c) shall not be applied.</p>	<p><u>New paragraph (f)</u> It is proposed to clarify the intent that the special short landing provisions of paragraph (b) are not to be used alongside the steep approach provisions of paragraph (c) since the two may not be compatible.</p>
76	CAT.POL.A.335	<p>Amend paragraph (b) as follows:- (b) When the appropriate weather reports and/or forecasts indicate that the runway at the estimated time of arrival may be contaminated,</p>	<p>The revised wording has removed important text from EU-OPS 1 which made it clear that the landing distance data must be appropriate for the conditions and that this data has been approved by the competent Authority. It is proposed that it is</p>

		<p>the landing distance determined by using data acceptable to the Authority for these conditions shall not exceed the LDA. The operator shall specify in the operations manual the landing distance data to be applied.</p>	<p>reinstated.</p>
<p>90</p>	<p>CAT.POL.H.225 (a) and (b)</p>	<p>This section does not reflect clearly the requirements of Appendix 1 to JAR-OPS 3.005(i) and has some incorrect references. It is proposed that additional elements are included (as indicated) to provide a more comprehensive version aligned with the original intent of JAR-OPS 3.</p> <p>(a) For multi-turbine powered helicopters, with a MPSC of six or less, operating to/from public interest sites (PIS), which were established as aerodrome/operating sites before 1 July 2002 and located in a congested hostile environment, prior approval shall be obtained from the competent authority and the authority of the State in which it is intended to conduct such operations <i>specifying the following:</i></p> <ul style="list-style-type: none"> (1) <i>the public interest site(s);</i> (2) <i>the type(s) of helicopter; and</i> (3) <i>the type(s) of operation</i> <p>(b) Where the size of the PIS, or its obstacle environment, does not allow the helicopter to be operated in performance class 1, the approval</p>	<p>Clarification and consistency.</p>

		referred to in (a), from the competent authority, shall also include the approval to conduct operations in performance class 2 without complying with CAT.POL.H.310(a)(2)(b) or CAT.POL.H.325(a)(2);(b) can be obtained, provided that: 	
91, 92	CAT.POL.H.310(c)(2) and CAT.POL.H.325(c)(2)	The text in this paragraph, and CAT.POL.H.325(c)(2), sets a requirement to calculate take-off and landing mass having “taken into account” a number of criteria that cannot be applied consistently or even practically across all helideck operations. It is recommended that, as a priority, EASA establish a Working Group of helicopter offshore operations specialists to develop a coherent policy for offshore helicopter performance standards.	There is no AMC to support this ‘non specific’ requirement. Operational considerations make full accountability for deck edge clearance and drop down impractical for all situations. Imposition of the requirement as it stands will lead to an inconsistent application by States, possibly with no safety benefit or potentially even a negative safety benefit.
96	CAT.POL.MAB.105(a)(9)	Zero Fuel Mass is applicable to Aeroplanes only. Amend text to read: (9) Take-off Mass, Landing Mass and, for aeroplanes , Zero Fuel Mass;	Amendment 5 to JAR-OPS 3 deleted the Appendix 1 to JAR-OPS 3.625 requirement for Zero Fuel Mass information on the basis that ‘ <i>the term is not used in helicopters and there is no definition</i> ’.
118	CAT.IDE.A.355	This section, together with the associated AMC, should be replicated for helicopters as CAT.IDE.H.355 etc.	Alignment of equipment requirements for current and future IFR needs.

123	CAT.IDE.H.180 (a)(1)	<p>The text describes the MPSC discriminant based on JAR-OPS 3.695(c) text. However, the matter raises the issue that the text in JAR-OPS 3 was actually incorrect in that, as for many other examples within the requirements, the correct factor should be '19 or less' and not 'less than 19'. The discriminant of up to 19 is well established and the JAR-OPS 3 text would have been amended by the HSST had the error been noticed.</p> <p>Amend the text to read:</p> <p>(1) for helicopters with an MPSC of more than nine and less than 19 or less, if:</p> <p>(could also be written as 'less than 20')</p>	<p>Correcting an unintended error in JAR-OPS 3 that has been transferred into the IR. This was not a frequently used requirement in JAR-OPS 3, and the error remained undetected but would have been amended had it been so. (Chairman of HSST remark).</p>
123	CAT.IDE.H.185	<p>Requirement omission. JAR-OPS 3.705(a)(6) requires that "For a helicopter not equipped with a flight data recorder, the parameters necessary to determine main rotor speed are recorded.</p> <p>A new sub-paragraph within CAT.IDE.H.185 should be assigned to this requirement.</p>	<p>Alignment with JAR-OPS 3 requirements and acknowledgement of current helicopter equipment fits.</p>
126	CAT.IDE.H.205 (c)	<p>Textual correction:</p> <p>(c) Safety harnesses and safety belts shall have a single point release.</p>	<p>Rule clarity.</p>

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135	AMC1- CAT.GEN.AH.135 (a)(3)	Instructions for single pilot VFR day operations. This text is not included in EU-OPS or JAR-OPS 3 and no justification has been provided. Its inclusion will cause problems for operators who currently fly at night or in IFR with a passenger in the vacant flight crew seat under the terms of their Operational Manual. Remove the article.	Not required under EU-OPS or JAR-OPS 3 and adequately controlled through operator OM procedures.
137	AMC1- CAT.GEN.AH.195	Delete mention of 'aeroplane' from title. This refers to both aeroplanes and helicopters	Correction
137	GM1- CAT.GEN.AH.195	Delete mention of 'aeroplane' from title. This refers to both aeroplanes and helicopters. Amend first paragraph to read: Procedures for the inspections and maintenance practices of the FDR and CVR systems are given in ICAO Annex 6, Part I, Part III and in Annex II-B of EUROCAE ED-112.	Correction
198	AMC1- CAT.OP.AH.155 Carriage of Special Categories of Passengers (SCPs)	This text appears to have combined the OPS1.260 /JAR OPS 3.260 Regulations with OPS1.265 / JAR OPS 3.265 and has thus blurred the distinction between the carriage of persons with reduced mobility (PRM) and inadmissible passengers, deportees or persons in custody. In consequence important guidance, which related the number of PRMs carried to the numbers of able bodied persons	Alignments with OPS 1.260 text and in addition ensure that consistent standards are applied to all operators of Member States.

		<p>able to assist them in an emergency evacuation of an aircraft, has been lost.</p> <p>Propose the inclusion of the following sub-paragraph after the second sub-paragraph 3:</p> <p>“5. In circumstances in which the number of special categories of passengers (SCPs), particularly if they suffer from reduced mobility, forms a significant proportion of the total number of passengers on board:</p> <ul style="list-style-type: none"> a. The number of SCPs should not exceed the number of able-bodied persons capable of assisting with an emergency evacuation; and b. They should not be seated adjacent to an emergency exit.” 	
<p>203</p>	<p>AMC1- CAT.OP.AH.170</p> <p>TRAINING PROGRAMME</p>	<p>This new AMC material allows an operator to replace the passenger safety briefing or demonstration with a passenger training programme. However, there appears to be no requirement to repeat the training programme provided a passenger so trained has flown on the aircraft type within 90 days. This could permit passengers to fly indefinitely without any further briefings (provided each flight took place before 90 days had elapsed between flights). This is considered dangerous as without regular recurrent and/or refresher training, safety information will be forgotten.</p> <p>Proposal:</p>	<p>Safety by ensuring all passengers have been recently briefed or trained in relation to safety matters.</p>

		<p>Change text to read:</p> <p>2. Only passengers who have been trained according to this programme and have flown on the aircraft type within the last 90 days may be carried on board without receiving a briefing / demonstration. Once 90 days have elapsed after receiving the training programme, passengers should either repeat the training programme or receive a briefing / demonstration before flying.</p>	
210	AMC1-CAT.OP.AH.181 (c)(1)	<p>Amend Title and Heading to reflect subject correctly:</p> <p>AMC1-CAT.OP.AH.181 (c)(1) (b)(1) Selection of aerodromes and operating sites - helicopters</p> <p>OFFSHORE COASTAL AERODROME</p>	Correction
263	GM1-CAT.POL.A.310	<p>The last sentence of paragraph 1 in this GM1 is not strictly true - "It is accepted that performance accountability for engine failure need not be considered until a height of 300 ft is reached."</p> <p>It is recommended that this sentence is deleted from this GM1.</p>	<p>The availability of data in AFMs of Class B aeroplanes with engine failure accountability is variable between types, so it is an imprecise generalisation to state that engine failure need not be considered until a height of 300 ft is reached.</p> <p>Whilst data for engine failure accountability <u>generally</u> begins from heights of <u>around</u> 300ft, it is not the case that the operating rules completely ignore the possibility of engine failure below this height. For example, the factors prescribed for the take-off field</p>

			<p>lengths (in paragraph CAT.POL.A.305) include some allowance for the possibility of an engine failure during take-off and the consequential need to bring the aircraft to a stop on the runway. Also, requiring higher operating weather minima (compared to aeroplanes with more comprehensive engine failure accountability) compensates for the lack of direct engine failure accountability (see Subpart E ‘Assumed engine failure height above the runway versus RVR’ table). This is another method of safeguarding the effects of engine failure.</p> <p>Both these are examples of <u>indirectly</u> accounting for engine failure, in the absence of data which would allow for <u>direct</u> engine failure accountability.</p>				
278	AMC1-CAT.POL.H.205 (e)	The diagram at Figure 2: Obstacle accountability is corrupted and does not show the correct parameters. Refer to ACJ OPS 3.490(d) Figure 2.	Correction and alignment with JAR-OPS 3				
317	AMC1-CAT.POL.MAB.100(d)	<p>AMC1-CAT.POL.MAB.100(d) should be amended to add an additional table to include the revised notional ski weights recently approved by European Commission Decision of 1.12.2010 authorising the UK to derogate from Council Regulation (EEC) No 3922/1991 with respect to the use of standard masses for ski equipment.</p> <table border="1" data-bbox="676 1257 1305 1361"> <thead> <tr> <th>Item</th> <th>Notional Weight</th> </tr> </thead> <tbody> <tr> <td>Boots</td> <td>7 kg</td> </tr> </tbody> </table>	Item	Notional Weight	Boots	7 kg	<p>The results of a combined UK CAA / Industry survey of ski equipment have recently been approved by European Commission Decision of 1.12.2010 but have not yet been incorporated into the EASA IRs. Adding a new table for ski equipment would support the Commission Decision whilst allowing all EASA States to use the new standard masses.</p>
Item	Notional Weight						
Boots	7 kg						

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		<table border="1"> <tr> <td></td> <td></td> </tr> <tr> <td>Skis</td> <td>12 kg</td> </tr> <tr> <td>Snowboards</td> <td>17 kg</td> </tr> </table>			Skis	12 kg	Snowboards	17 kg	
Skis	12 kg								
Snowboards	17 kg								
317	AMC1-CAT.POL.MAB.100(d) paragraph 1	Renumber second a. and b. as c. and d. Or use bullet-points.	Clarity. It is confusing to have repeated references. If someone refers to 1(a), which one do they mean?						
338	AMC1-CAT.IDE.A.150	<p>The end of the list is: “... ground based augmentation system (GBAS (GPS landing system, GLS) or ...”</p> <p>There are two brackets opened here, but only one is closed.</p> <p>Paragraph 65 of the Explanatory Note says that GLS previously meant ‘GNSS Landing System’.</p> <p>Should it be: “... ground based augmentation system (GBAS) landing system (GLS) or ...” so that GLS means ‘GBAS Landing System’ as in paragraph 65 of the Explanatory Note?</p>	Clarity and Consistency.						
339	AMC1-CAT.IDE.A.180	<p>Amend paragraph 5 to read:</p> <p>5. be audible and intelligible at all passenger seats</p>	Correction and alignment with original text at EU-Ops 1.695						
377	AMC1-CAT.IDE.A220 First Aid Kits	The text as currently proposed, permits an operator to amend the contents of a first aid kit according to the characteristics of the	Consistency of first aid kits across Member States operators whilst allowing operators to add items to kits depending on the characteristics of an operation.						

		<p>operation. The word amend means to “make changes”. Comments were received in CRST-DAT.IDE.AH stating that previous text giving permission to adapt the contents would permit operators to reduce the contents. The EASA reply was that this would be changed in order to allow the operator to <i>complement</i> the kit to ensure minimum content is maintained. The new term of <i>amend</i> does not ensure minimum content and should be changed to <i>complement</i>.</p> <p>Proposal:</p> <p>Change text to read:</p> <p>“However, these kits may be amended complemented by the operator</p>	
378	<p>AMC1.CAT.IDE.A.220 First Aid Kit Paragraph 2.c.v</p>	<p>Specifies the inclusion of a ground/air visual signal code for use by survivors.</p> <p>Proposal: Delete paragraph 2.c.v</p>	<p>This is a historical item which has no relevance to safety in the modern era.</p> <p>The contents list for a first aid kit should only include items which add value and are relevant to current airline operations.</p>
378	<p>AMC1-CAT.IDE.A225 Content of Emergency Medical Kit</p>	<p>Comment:</p> <p>The text as currently proposed, permits an operator to adapt the contents of an emergency aid kit according to the characteristics of the operation. The word adapt means to “make changes”. Comments were received in CRST-DAT.IDE.AH stating that previous text giving</p>	<p>Consistency of first aid kits across Member States operators whilst allowing operators to add items to kits depending on the characteristics of an operation.</p> <p>(See also text from UK CAA concerning the word “amend” in relation to AMC1-CAT.IDE.A225. It is suggested that these 2 very similar texts should use the word “complement” only – again for consistency)</p>

		<p>permission to adapt the contents would permit operators to reduce the contents. The EASA reply was that this would be changed in order to allow the operator to complement the kit to ensure minimum content is maintained. The new term of adapt does not ensure minimum content and should be changed to complement</p> <p>Proposal:</p> <p>Change text to read:</p> <p>“However, these kits should be adapted complemented by the operator</p>	
379	<p>AMC1.CAT.IDE.A.225 Extended Medical Kit Paragraph 2.a.xiv</p>	<p>Paragraph 2.a.xiv states a requirement for an intubation set to be included in the Emergency Medical Kit.</p> <p>Proposal: Delete paragraph 2.a.xiv</p>	<p>International experts on resuscitation have advised that the risks associated with attempts at intubation in the unsuitable environment of an aircraft (confined space, inadequate lighting, noise and vibration, etc) far outweigh the potential benefits.</p> <p>This is not an ICAO requirement and should not be included in the list. Airlines which choose to include such equipment in their kit are of course able to do so.</p>
379	<p>AMC1.CAT.IDE.A.225 Extended Medical Kit Paragraph 2.a.xvi</p>	<p>Paragraph 2.a.xvi states a requirement for blood glucose testing equipment.</p> <p>Proposal: Delete paragraph 2.a.xvi</p>	<p>While airlines may choose to include such equipment, it is not an essential requirement and should not be included in a regulatory document. In those situations where hypoglycaemia is suspected, a therapeutic trial of oral or, if necessary, intravenous glucose can be given without the need for testing of blood glucose. Hyperglycaemia cannot be treated onboard a commercial aircraft.</p>

			The regulatory requirements for an emergency medical kit should be limited to those items which can be justified as essential.
379	AMC1.CAT.IDE.A.225 Extended Medical Kit Paragraph 2.c.vii	Paragraph 2.c.vii adds a new requirement for both oral and injectable antihistamine. Proposal: Delete requirement for an oral histamine in paragraph 2.c.vii i.e. delete “oral and”	An oral antihistamine is specified in the First Aid Kit requirements. The requirement for an oral antihistamine in both the FAK and the EMK is an unnecessary duplication.
379	AMC1.CAT.IDE.A.225 Extended Medical Kit Paragraph 2.c.viii	Paragraph 2.c.viii adds a new requirement for sedative /anticonvulsant in injectable, rectal & oral forms. Proposal: Amend paragraph to “sedative/anticonvulsant oral and either injectable or rectal forms”.	There is no justification for requiring both injectable and rectal forms in an aircraft Emergency Medical Kit.
380	AMC1.CAT.IDE.A.225 Extended Medical Kit Paragraph 2.c.xvi	Paragraph 2.c.xvi adds a new requirement for antihypertensive medication. Proposal: Delete paragraph 2.c.xvi	Acute and life-threatening hypertension is rare and its safe and effective management requires the use of medical monitoring equipment which would not be available on a commercial aircraft. Treatment for hypertension which is not life-threatening should not be necessary on an aircraft. The regulatory requirement for medication to be included in an airline medical kit should be confined to that which is required and can safely be used in an emergency medical event on board a commercial aircraft in flight. There is no justification for requiring antihypertensive medication in an aircraft Emergency Medical Kit.

<p>380</p>	<p>AMC1.CAT.IDE.A.225 Extended Medical Kit Paragraph 2.c.xvii</p>	<p>Paragraph 2.c.xvii adds a new requirement for an oral beta-blocker. Proposal: Delete paragraph 2.c.xvii</p>	<p>There is no justification for requiring an oral beta-blocker in an aircraft Emergency Medical Kit.</p>
<p>380</p>	<p>AMC2-CAT.IDE.A.225 Carrying under Security Conditions</p>	<p>JAR OPS 1.755 specified that the EMK “should be carried under security conditions, on the flight deck where practicable”.</p> <p>Paragraph 1 states that the EMK should be carried on the flight crew compartment “where possible”. It is of course always “possible” to do this.</p> <p>Proposal: Delete “where possible the Emergency Medical Kit should be carried on the flight crew compartment” and substitute with “The operator should determine the most appropriate location for the extended medical kit, taking into account the requirements for security and for accessibility of the kit in an emergency”</p>	<p>The flight deck may not be the most appropriate place to carry an extended medical kit, particularly since the advent of the locked flight deck door. Arguably this could even present a security risk, in that a faked medical emergency could be used as a pretext to persuade crew to open the flight deck door in flight. Also carriage on the flight deck may delay access to the extended medical kit in a genuine medical emergency. The operator should have the responsibility for determining the appropriately secure stowage for the extended medical kit.</p>
<p>380</p>	<p>AMC3-CAT.IDE.A.225 Access to Emergency Medical Kit Paragraphs 2-4</p>	<p>Paragraphs 2-4 create a hierarchy of those people who may administer medication, with paragraphs 3 and 4 requiring confirmation that no individuals in the preceding paragraphs are on board.</p> <p>Proposal:</p> <ol style="list-style-type: none"> 1. Amend Paragraph 2 to read: Drugs should only be administered by health professionals or cabin crew acting under the authority of the operator’s medical 	<p>National regulations may vary in relation to those individuals who may legally administer medication. In addition, there is accumulated evidence over many years that cabin crew can safely administer medication provided they have adequate training and information. The widespread use of ground to air medical advisory services has further enhanced the capability of cabin crew to administer medication without the involvement of an onboard health professional.</p>

		<p>adviser.</p> <p>2. Delete paragraphs 3 & 4.</p>	<p>The regulatory requirement should apply the minimum constraints consistent with the safe administration of medication.</p>
393	AMC1-CAT.IDE.H.115	<p>The landing light provisions mentioned here are not required for CAT helicopters and have been transposed incorrectly from the NPA where they were appropriate for General Aviation helicopters.</p> <p>Remove this section.</p>	<p>Correction</p>
394	AMC1-CAT.IDE.H.125 (d)(2) & 130(a)(7)	<p>Amend the Title to add reference to AMC1-CAT.IDE.130 (h)(6) which is also relevant.</p>	<p>Correction</p>
398	AMC1-CAT.IDE.A.180	<p>Amend title to H from A to correct unintended error:</p> <p>AMC1-CAT.IDE.A H.300 Public Address System</p> <p>Amend paragraph 5 to read:</p> <p>5. be audible and intelligible at all passenger seats</p>	<p>a. Correction</p> <p>b. Correction and alignment with original text at JAR-OPS 3.695</p>
426	AMC1.CAT.IDE.H.220 First Aid Kit Paragraph 2.b	<p>Paragraph 2.b specifies a list of medication that should be carried in helicopter first aid kits. This is identical to that for aeroplane first aid kits.</p> <p>Proposal: Delete paragraphs 2.b.iii to 2.b.vi</p>	<p>The regulatory requirement should be based on the minimum safety requirements. Helicopter operations are inevitably short duration flights and therefore the requirement to carry a range of medications, other than a simple analgesic and anti-emetics, cannot be justified.</p>

435	AMC2-CAT.IDE.H.345	The proposed text, although mostly reflecting that from JAR-OPS 3.865, does not adequately cover all possibilities for equipment fitment especially when compared to that detailed for Aeroplanes at AMC2-CAT.IDE.A.345. It is recommended that the helicopter requirements be more closely aligned with the aeroplane ones for what are in many cases similar activities.	Alignment of equipment requirements for current and future IFR needs.
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